

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

AECOM ENERGY & CONSTRUCTION, INC.,  
Plaintiff,

v.

THE UNITED STATES OF AMERICA,  
Defendant.

Case No. 20-2016 C

**JOINT STATUS REPORT AND PROPOSED SCHEDULE**

Plaintiff AECOM Energy & Construction, Inc., formerly known as URS Energy & Construction, Inc., (“URS”) and Defendant the United States of America (“Government”) submit this Joint Status Report pursuant to the Court’s September 26, 2023 Order requiring the parties to “jointly submit a status report proposing a schedule (or separate schedules if the parties cannot agree), including (1) dates by which all search terms will be determined, (2) a new document production deadline for the government, and (3) proposed deadlines for fact discovery, expert discovery, dispositive motions, and trial.” ECF No. 33.

Since submitting their September 8, 2023 Joint Status Report, ECF No. 32, the parties have agreed upon all outstanding search terms. The parties have also agreed to the Government’s requested modified document production completion date of January 10, 2024, with the express mutual understanding and agreement that the Government does not intend to file any further requests for any extension of the production deadline. Although the Government does not currently foresee any issue with meeting the January 10, 2024 production deadline, the Government is not waiving its right to file any appropriate motion if issues arise that so dictate. Accordingly, the parties set forth below a proposed schedule addressing the remaining categories specified in the Court’s Order.

<b>Event</b>	<b>New Deadline</b>
Completion of Government Document Production	1/10/2024
Close of Fact Discovery	7/03/2024
Exchange of Expert Reports	8/30/2024
Exchange of Rebuttal Expert Reports	10/25/2024
Close of Expert Discovery	12/20/2024
Commencement of Dispositive Motion Briefing	3/7/2025
Dispositive Motion Responses	4/25/2025
Dispositive Motion Replies	5/30/2025
Pre-Trial Conference	8/25/2025
Trial	10/17/2025

The parties respectfully request that the Court enter the above-proposed schedule, with any necessary modifications for the convenience of the Court.

October 10, 2023

Respectfully submitted,

/s/ Charles C. Speth

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